

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

LAKEIA GREEN,

Plaintiff,

v.

POTOMAC FAMILY DINING GROUP
OPERATING COMPANY LLC, *doing
business as* “APPLEBEE’S”

Defendant.

Case No.: 1:17-cv-01150-LO-MSN

JOINT MOTION FOR APPROVAL OF SETTLEMENT

Plaintiff Lakeia Green (“Plaintiff”) and Defendant Potomac Family Dining Group Operating Company, LLC (“Defendant”) (collectively the “Parties”) respectfully request that this Honorable Court approve a settlement agreement that the Parties have reached concerning Plaintiff’s lawsuit under the Fair Labor Standards Act (“FLSA”), 29 U.S.C. § 201 *et seq.* The Parties seek Court approval of this settlement because claims under the FLSA, like those released by Plaintiff in the Settlement Agreement and General Release (hereinafter “Agreement”) that all parties have entered into, may not be waived or released without U.S. Department of Labor or Court approval. The Parties further agree and request the Court to waive an oral hearing on this Motion.

Dated: April 19, 2019

Respectfully submitted,

By: /s/ Curtis Cannon

Curtis Cannon
Goldberg Finnegan
8401 Colesville Rd., Suite 630
Silver Spring, MD 20910
T:(301)589-2999
E: ccannon@goldbergfinnegan.com

Nicholas Raymond Conlon
Jason Tavis Brown
JTB Law Group, LLC
155 2nd Street, Suite 4
Jersey City, NJ 07302
T: (877) 561-0000
E: nicholasconlon@jtblawgroup.com
E: jtb@jtblawgroup.com

Attorney for Plaintiffs

/s/ Daniel C. Deacon

Kara M. Maciel (admitted pro hac vice)
Jordan Schwartz (admitted pro hac vice)
Daniel Deacon (VSB No. 87451)

CONN MACIEL CAREY LLP
5335 Wisconsin Avenue, NW, Suite 660
Washington, DC 20015
Telephone: 202-909-2730
Fax: 202-827-7899
Email: kmaciel@connmaciel.com

*Attorneys for Potomac Family Dining
Group Operating Company, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of April 2018, a copy of this Joint Motion for Approval of Settlement was served electronically on counsel for the Plaintiffs via the Court's CM/ECF system to:

Curtis Cannon
Goldberg Finnegan
8401 Colesville Rd., Suite 630
Silver Spring, MD 20910
T: (301) 589-2999
E: ccannon@goldbergfinnegan.com

Nicholas Raymond Conlon
Jason Tavis Brown
JTB Law Group, LLC
155 2nd Street, Suite 4
Jersey City, NJ 07302
T: (877) 561-0000
E: nicholasconlon@jtblawgroup.com
E: jtb@jtblawgroup.com

Attorneys for Plaintiffs

/s/ Daniel C. Deacon
Daniel C. Deacon